

EXHIBIT B

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UBER TECHNOLOGIES, INC.;
RASIER, LLC; and RASIER-CA, LLC

[Additional Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF JENNIFER
HANDLEY IN SUPPORT OF
DEFENDANTS' MARCH 17, 2025 BRIEF
PURSUANT TO SPECIAL MASTER
ORDER NO. 2, § III(6)**

This Document Relates to:

ALL ACTIONS

DECLARATION OF JENNIFER HANDLEY

I, Jennifer Handley, having personal knowledge of the following state:

1. I am the Senior Legal Director, Global Safety, at Uber. I was first employed by Uber in December 2018 and have worked as in-house counsel for the past 6 years. My previous roles include Senior Counsel, Safety and Legal Director, Safety. In my current role, as has been the case throughout my tenure at Uber, I am responsible for providing legal advice to Uber’s leadership and employees related to safety issues, procedures, and policy, among other legal advice. I offer this Declaration in the above-captioned matter in support of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC’s March 17, 2025 brief pursuant to Special Master Order No. 2, § III(6) (ECF 2357). The facts set forth herein are true and correct and are based on my own personal knowledge, and I could and would competently testify thereto if called.

2. I have reviewed the document identified in the privilege log as JCCP_MDL_PRIVLOG014737. It is a draft Executive Summary for Uber’s Safety Report dated November 13, 2019 and marked “Attorney-Client Privileged and Confidential/Prepared at the direction of counsel.” This draft document discusses Uber’s safety policies and practices. Given the legal risks of public statements regarding safety issues, a team of Uber’s in-house attorneys, including myself, directed and coordinated the drafting of the Safety Report, including the Executive Summary. Uber’s in-house attorneys directed and coordinated this effort to facilitate the provision of legal advice on the statements in the then draft report. Uber’s in-house attorneys did, in fact, provide legal advice at every step of the way. The draft report was maintained confidentially throughout the drafting process. Each non-attorney involved with drafting the report did so at the direction, and under the supervision, of counsel.

3. I have reviewed the document identified in the privilege log as JCCP_MDL_PRIVLOG015009. It is a draft Executive Summary for Uber’s Safety Report dated

1 November 12, 2019 that is marked “Attorney-Client Privileged and Confidential/Prepared at the
2 direction of counsel.” This draft document discusses Uber’s safety policies and practices. Given the
3 legal risks of public statements regarding safety issues, a team of Uber’s in-house attorneys, including
4 myself, directed and coordinated the drafting of the Safety Report, including the Executive Summary.
5 Uber’s in-house attorneys directed and coordinated this effort to facilitate the provision of legal advice
6 on the statements in the then draft report. Uber’s in-house attorneys did, in fact, provide legal advice
7 at every step of the way. The draft report was maintained confidentially throughout the drafting
8 process. Each non-attorney involved with drafting the report did so at the direction, and under the
9 supervision, of counsel.
10

11 I declare under penalty of perjury that the foregoing is true and correct.

12 Executed in Denver, Colorado on March 17, 2025.

13 By: Jennifer Handley

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